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January 9, 2024

via ECF

Hon. Robert M. Levy, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Letter Motion Requesting to Set the deadline to file First Amended Complaint:

1:23-cv-06962-MKB-RML *Hu v. Whaleco, Inc*

Dear Honorable Sir,

We represent the Plaintiff in the above referenced matter. We write with the consent of the Defendant to propose setting the deadline for the Plaintiff's time to file their First Amended Complaint to be February 5, 2024.

On September 20, 2023, the Plaintiff initiated the complaint against the Defendant. See Dkt. No. 1. The Defendant's deadline to file their response to the complaint was extended until January 8, 2024 from December 8, 2023. *See* Elec Order dated Nov. 29, 2023. Following this extension, the Defendant's counsel informed the Plaintiff's counsel of their intention to file a pre-motion letter in response to the operating complaint. Subsequently, the Plaintiff notified the Defendant's counsel of their intention to amend the complaint.

In consideration of efficiency and after learning about the Plaintiff's intention to amend the complaint, the Defendant's counsel requested the Court to stay the deadline for the response to the operative complaint until the Plaintiff files their amended complaint. Your Honor, granted this request. *See*, Elec. Order dated Jan 8, 2024. Now, with the consent of both parties, we kindly request the Court to set a new deadline for the Plaintiff to file their First Amended Complaint as February 5, 2024. This extension is sought due to the prescheduled court commitments of the Plaintiff's counsel in other matters, leaving limited time to work on the amended complaint in this case. No party to this action will be prejudiced if the said request is granted.

For the foregoing, reasons mentioned above, Plaintiff's respectfully request this Court to set the deadline to file the first amended complaint be February 05, 2024.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ John Troy

John Troy

Attorney for Plaintiffs

Cc: all counsel of record *via* ECF

/pk